

## HARVEY FISHBEIN

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June 3, 2021

### VIA EMAIL

Hon. Richard M. Berman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: USA v. Jafari Fray  
S2 06 CR 494-01 (RMB)

Dear Judge Berman:

As directed by the Court during the May 18, 2021 telephone conference in the above-referenced matter, I have spoken with USPO Godwin Ogunmefun regarding travel by my client, Jafari Fray. USPO Ogunmefun has informed me that because of Mr. Fray's unauthorized travel to Atlanta, Georgia, he will not consent to travel by Mr. Fray. However, he has said that he will of course defer to the direction of this Court.

I respectfully request that the Court permit Mr. Fray to travel to Orlando, Florida by air (JFK to Orlando, nonstop) on June 12, 2021, returning on June 16, 2021. The purpose of this trip is for he and his New York family consisting of his partner, Jessica Sabb, and their three children (including the two infant children) to meet the Atlanta, Georgia portion of the family consisting of Mr. Fray's two adult daughters, their mother Ebony, and his grandson. The Atlanta contingent has never met Jafari's two infant children. Both families will be staying at the Grove Resort and Waterpark Orlando in Winter Garden, Florida.

As Mr. Fray told the Court during the May 18 hearing, he sincerely apologizes to all parties for his unauthorized travel to attend to a family matter in Georgia. But as eloquently stated at the hearing by Antoinette Holloway, Mr. Fray's therapist, regarding Probation's opposition to Mr. Fray's future travel, she told the Court, "I understand that policy is set in place. However, it's a growth process that Mr. Fray is going through, and part of him reintegrating into society is the family support piece. So, I mean, if we negate that part then we kind of take ten steps back. If he's made to feel like he can never be productive as far as his family structure is concerned, that kind of, like, sets us back a couple of steps, if that makes sense to you." (p. 24 of the 5/18/21 transcript)

I respectfully urge the Court to grant Mr. Fray's request to travel June 12 through June 16 to Orlando. I believe a family trip meant to unify two factions of the family is an excellent step in building a strong future for Mr. Fray.

Respectfully submitted,  
/s/  
Harvey Fishbein

cc: Jonathan Rebold, AUSA (by email)  
Probation Officer Godwin Ogunmefun (by email)

<p>Application to travel is granted. Defendant <u>shall provide all trip details to probation,</u> <u>including flight information and hotel</u> <u>address.</u></p> <p>_____</p> <p>_____</p> <p>_____</p>
<p><b>SO ORDERED:</b> <b>Date:</b> <u>6/9/2021</u></p> <p> Richard M. Berman, U.S.D.J.</p>